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A Limited Liability Partnership

2 Including Professional Corporations

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12 Attorneys for Defendant NORDSTROM, INC.

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14 **UNITED STATES DISTRICT COURT**  
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 KEVIN BRANCA, individually and on  
17 behalf of all others similarly situated,

18 Plaintiff,

19 vs.

20 NORDSTROM, INC.,

21 Defendant.

Case No.: 3:14-cv-02062-MMA-AGS

**DECLARATION OF KERI S.  
GAVIN IN SUPPORT OF  
DEFENDANT NORDSTROM,  
INC.'S FEE STATEMENT**

**DECLARATION OF KERI S. GAVIN**

I, Keri S. Gavin, hereby declare as follows:

1. I am Chief Practice Management Officer for the law firm of Sheppard, Mullin, Richter & Hampton LLP, counsel of record for Defendant Nordstrom, Inc. in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them.

2. In the regular course of my job duties, I review a variety of market surveys compiled by industry leaders, including Thomson Reuters' Peer Monitor, for peer groups such as the AmLaw 100.

3. Attached as **Exhibit A** to this declaration is a chart I prepared from the 2017 Peer Monitor survey data. The Peer Monitor survey data shows the median standard rates charged by participating AmLaw 100 firms for partners and associates of varying years of experience, restricted to the California Litigation market. The Peer Monitor AmLaw 100 group includes 55 participating firms, including Sheppard, Mullin, Richter & Hampton, LLP.

4. As part of my regular job duties, I maintain the billing rates for Sheppard, Mullin, Richter & Hampton LLP's attorneys and other timekeepers. Also shown within the chart of Exhibit A of this declaration are the 2017 rates charged in this case by P. Craig Cardon, Dana J. Dunwoody, Shanna M. Pearce, and Eric J. DiIulio.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 6/20/17

By



Keri S. Gavin

# **EXHIBIT A**

**Exhibit A**

Attorney Name	Title	Experience Level	Sheppard Client Rate	Group Rate <sup>1</sup>		
				San Diego	Los Angeles	San Francisco
P. Craig Cardon	Partner	23 Years	\$715.50	--	\$778.00	--
Dana J. Dunwoody	Partner	31 Years	\$675.00	\$782.00	--	--
Shanna M. Pearce	Associate	2010 Grad	\$558.00	\$650.00	--	--
Eric J. Dilulio	Associate	2014 Grad	\$414.00	--	--	\$468.00

<sup>1</sup>Median agreed (client) rates for calendar 2017, as reported in Thomson Reuters' Peer Monitor database for the AmLaw 100 group (55 participating firms) for San Diego, Los Angeles, and San Francisco Litigation attorneys.